WILSON, ELSER, MOSKOWITZ EDELMAN & DICKER, LLP Attorneys for County Defendants 1133 Westchester Avenue White Plains, NY 10604 (914) 323-7000 Attn: Peter A. Meisels

Janine Mastellone Lalit K. Loomba Allison Holubis

UNITED STATES DISTRICT COURT EASTERN DISTRICT OF NEW YORK

-----x Docket No.: 18-CV-3007 (JS) (GRB)

JOSEPH JACKSON,

Plaintiff,

-against- : COUNTY DEFENDANTS' : PRIVILEGE LOG

NASSAU COUNTY; THE INCORPORATED VILLAGE : OF FREEPORT; DETECTIVE ROBERT DEMPSEY; DETECTIVE GARY ABBONDANDELO; DETECTIVE : JOHN M. HOLLAND; DETECTIVE MICAHEL HERTS; DETECTIVE MARTIN ALGER; DETECTIVE ANTHONY SORRENTINO; DETECTIVE DAVID L. ZIMMER; POLICE OFFICER MELENDEZ; LIEUTENANT BURDETTE; SERGEANT McHALE; SERGEANT NOLL; DETECTIVE SHARKEY; POLICE OFFICER DOWDELL: POLICE OFFICER BARRY McGOVERN; DETECTIVE TURNER; DETECTIVE EDWARD HAGGERTY; POLICE OFFICER HALL; DETECTIVE LAURETTE KEMP; DETECTIVE WILLIAM TWEEDY; DETECTIVE ANTHONY KOSIER; DETECTIVE SERGEANT DAN SEVERIN; DETECTIVE JERL MULLEN; THE ESTATE OF DETECTIVE JERL MULLEN; JOHN DOE, AS THE ADMINISTRATOR OF THE ESTATE OF JERL MULLEN; and JOHN and JANE DOE 1 through 20,

Defendants.

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Bates	Author	Recipient	Document	Privilege
2843-	Sheryl	File	File Memo containing legal	Attorney
2853	Anania, Esq.		analysis of investigation of	Work-Product
			prosecution of Joseph Jackson	
2899	Sheryl	File	Cover page from File Memo	Attorney
	Anania, Esq.		containing legal analysis of	Work-Product
			investigation of prosecution of	
			Joseph Jackson	
3043	Tammy J.	Sheryl	e-mail containing analysis re: Det.	Attorney
	Smiley, Esq.	Anania	Robert Dempsey	Work-Product
3156	Sheryl	Mike	e-mail exchange December 4, 2017	Attorney
2100	Anania, Esq.	Walsh	re: Bob Dempsey and Gary	Work Product
	inditti, Esti	11 642522	Abbondandelo	, ork rodder
3157	Sheryl	File	Handwritten notes re:	Attorney
	Anania, Esq.		communication with Gary	Work Product
	7		Abbondandelo	· · · · · · · · · · · · · · · · · · ·
3160-	Sheryl	File	File Memo and handwritten notes	Attorney
3162	Anania, Esq.		re call with Glen Montes on	Work Product
2.02			October 19, 2017	
3191-	Sheryl	File	Handwritten notes of investigation	Attorney
3192	Anania, Esq.			Work Product
3195 -	Caryn	File	Handwritten notes of recap/review	Attorney
3206	Stepner, Esq.		and recent interviews	Work Product
3207	Tammy	Sheryl	Legal strategy	Attorney
	Smiley, Esq.	Anania,		Work Product
		Esq.		
3394	Sheryl Anania	File	Memo re call with Maurice Larrea	Attorney
			on 10/2/17	Work Product
3395	Sheryl Anania	Sheryl	Emails re factual investigation	Attorney
	Esq./Elizabeth	Anania		Work Product
	Curcio	Esq./Elizab		
		eth Curcio		
3396	Sheryl	Joshua	Emails re factual investigation	Attorney
	Anania, Esq.	Genn		Work Product
3436-	Dan Looney,	Mike	Memo re sentencing and	Attorney-
3437	Esq.	Walsh, Esq.	handwritten note	Work Product
3438-	Sheryl	File	Memo re People v. Jackson	Attorney
3448	Anania, Esq.			Work Product
3861-	Sheryl	File	Handwritten and typewritten notes	Attorney
3864	Anania, Esq.		and memo re Peddie Jackson	Work Product
4102-	NYS	n/a	Criminal History info re Roy	
4107			Isaacs, Jr., printed November 14,	
			2017	
4108	Sheryl	File	Memo re meeting with Roy Isaacs,	Attorney
	Anania, Esq.		Jr.	Work Product

Bates	Author	Recipient	Document	Privilege
4111	Sheryl Anania, Esq.	File	Memo re phone interview with Skwanitra Witherspoon	Attorney Work Product
4112- 4116, 4119	Sheryl Anania, , Esq. Joshua Glenn, Elizabeth Curcio	Sheryl Anania, Joshua Glenn, Elizabeth Curcio	Exchange of e-mails re: locating Skwanitra Witherspoon	Attorney Work Product
4120- 4124	Sheryl Anania, Esq.	File	Memo and handwritten notes re phone interview with Skwanitra Witherspoon	Attorney Work Product
4141- 4142	Paul Devore	Sheryl Anania, Esq.	Exchange of e-mails re: locating Roy Isaacs and Tyrone Isaacs	Attorney Work Product
4161- 4172	NYS	n/a	Criminal History info re: Tyrone Jackson, printed November 14, 2017	

Dated: White Plains, New York

June 20, 2019

WILSON, ELSER, MOSKOWITZ, EDELMAN & DICKER LLP

Attorneys for County Defendants

Peter A. Meisels Janine Mastellone Lalit K. Loomba Allison Holubis

1133 Westchester Avenue White Plains, New York 10604 (914) 323-7000 Our File No. 12473.00014